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Attorneys for Defendants CADENCE PREMIER
LOGISTICS, LLC (erroneously also sued as CADENCE
PREMIER LOGISTICS), CADENCE PREMIER
CARGO, INC. (erroneously also sued as CADENCE
PREMIER CARGO), and IHAR KUZNIATSOU
(erroneously sued as KUZNIATSOU IHAR)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ALFONSO IBARRA, an individual,
Plaintiff,

v.

CADENCE PREMIER LOGISTICS,
LLC, an Illinois Limited Liability
Company, CADENCE PREMIER
CARGO, INC., an Illinois Corporation,
CADENCE PREMIER CARGO, an
unknown entity, CADENCE PREMIER
LOGISTICS, an unknown entity,
KUZNIATSOU IHAR, an individual,
and DOES 1 through 50,

Defendants.

Case No. 2:24-cv-00342-AB-AGR

[Los Angeles County Superior Court
Case No. 22STCV31898]

Hon. André Birotte, Jr

NOTICE OF SETTLEMENT

Complaint Filed: September 29, 2022

Notice of Removal: January 12, 2024

Final Pretrial Conf.: June 13, 2025

Trial Date: June 30, 2025

Pursuant to Local Rule 16-15.7, Plaintiff ALFONSO IBARRA (“Plaintiff”) and Defendants CADENCE PREMIER LOGISTICS, LLC, CADENCE PREMIER CARGO, INC., and IHAR KUZNIATSOU (“Defendants”) (collectively, the “Parties”), hereby notify the Court that the Parties have agreed to terms on a settlement in this case and are working on finalizing the Confidential Settlement Agreement. Accordingly, the Parties request that the Court vacate all future Court

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1 dates and deadlines currently set, including the Final Pretrial Conference set for June
2 13, 2025, at 11:00 AM, and the Jury Trial set for June 30, 2025, at 8:30 AM, and for
3 the Court to set a Status Hearing regarding the status of the settlement in this matter.

4 Dated: March 18, 2025

LAW OFFICES OF KRISTIN L. HEINEMAN

6 

7 By:

8 GARRETT A. MARSHALL
9 Attorneys for Defendants CADENCE
10 PREMIER LOGISTICS, LLC (erroneously
11 also sued as CADENCE PREMIER
12 LOGISTICS), CADENCE PREMIER
CARGO, INC. (erroneously also sued as
CADENCE PREMIER CARGO), and IHAR
KUZNIATSOU (erroneously sued as
KUZNIATSOU IHAR)

13 Dated: March 19, 2025

LAW OFFICES OF BOB B. KHAKSHOORY

16 By: /s/ Bob B. Khakshooy, Esq.

17 Bob B. Khakshooy, Esq.

18 Sandeep G. Agarwal, Esq.

Attorneys for Plaintiff ALFONSO IBARRA

19 Dated: March __, 2025

MCELFISH LAW FIRM

23 By:

24 Raymond D. McElfish, Esq.

Attorneys for Plaintiff ALFONSO IBARRA

PROOF OF SERVICE

I, the undersigned, declare as follows:

I am employed in the County of Orange, State of California. I am over the age of 18 years, and not a party to the within action. I am an employee of or agent for LAW OFFICES OF KRISTIN L. HEINEMAN, whose business address is 1 Park Plaza, Suite 800, Irvine, CA 92614.

On March 19, 2025, I served the foregoing document(s): **NOTICE OF SETTLEMENT** to the following party(ies) in this action addressed as follows:

PLEASE SEE ATTACHED SERVICE LIST

- ☐ (BY MAIL) I caused a true copy of each document, placed in a sealed envelope with postage fully paid, to be placed in the United States mail at Irvine, California. I am "readily familiar" with this firm's business practice for collection and processing of mail, that in the ordinary course of business said document(s) would be deposited with the U.S. Postal Service on that same day. I understand that the service shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.
- ☐ (BY PERSONAL SERVICE) I caused to be delivered each such document by hand to each addressee above.
- ☐ (BY OVERNIGHT DELIVERY) I caused a true copy of each document, placed in a sealed envelope with delivery fees provided for, to be deposited in a box regularly maintained by **Federal Express®(Fedex)**. I am readily familiar with this firm's practice for collection and processing of documents for overnight delivery and know that in the ordinary course of business practice the document(s) described above will be deposited in a box or other facility regularly maintained by Fedex or delivered to a courier or driver authorized by Fedex to receive documents on the same date it is placed for collection.
- ☐ (BY FACSIMILE) By use of facsimile machine number (949) 774-4241, I served a copy of the within document(s) on the above interested parties at the facsimile numbers listed above. The transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine.
- ☒ (ONLY BY ELECTRONIC TRANSMISSION) Only by e-mailing the documents(s) to the persons at the email address(es) listed, pursuant to Fed.R.Civ.P.5(b)(2)(E).

Executed on March 19, 2025, in Irvine, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



Marlene Gomez

Ibarra v. Cadence Premier Logistics, LLC, et al.
Case No. 2:24-cv-00342-AB-AGR

SERVICE LIST

Bob B. Khakshooy, Esq. Sandeep G. Agarwal, Esq. LAW OFFICES OF BOB B. KHAKSHOORY 9545 Wilshire Blvd., Suite 601 Beverly Hills, CA 90212	T: 310-278-6666 F: 310-278-0866 E: bobkhakshooy4@gmail.com sandeepagarwal@californiaattorneygroup.com brendagarcia@californiaattorneygroup.com Attorney for Plaintiff ALFONSO IBARRA
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CM/ECF SERVICE LIST

The following e-mail addresses are also believed to be registered with the Court's CM/ECF System and should receive notice electronically automatically upon filing.

To the extent the document(s) are not to be filed and are only being served, email addresses below will be served in addition to those listed in the above Service List.

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